

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

53 STANHOPE LLC, *et al.*,¹

Debtors.

Chapter 11

Case No.: 19-23013 (RDD)

(Jointly Administered)

**DECLARATION OF MATTHEW B. STEIN IN SUPPORT OF OBJECTION OF
BROOKLYN LENDER LLC TO 53 STANHOPE DEBTORS' PROPOSED SALE OF
REAL PROPERTY ASSETS**

1. I am a member of the law firm Kasowitz Benson Torres LLP, attorneys for Brooklyn Lender LLC ("Brooklyn Lender") in the above-captioned chapter 11 cases. I respectfully submit this Declaration in Support of the *Objection of Brooklyn Lender LLC to 53 Stanhope Debtors' Proposed Sale of Real Property Assets*, filed contemporaneously herewith.

2. Attached hereto as Exhibit A is a true and correct copy of a transcript of the November 2, 2021 status conference before this Court.

3. Attached hereto as Exhibit B is a true and correct copy of the Court's January 4, 2022 email responding to Jennifer Recine's January 3, 2022 letter to the Court.

4. Attached hereto as Exhibit C is a true and correct copy of a January 4, 2022 email from Greg Corbin to representatives of Brooklyn Lender.

¹ The Debtors in these chapter 11 cases and the last four digits of each Debtor's taxpayer identification number are as follows: 53 Stanhope LLC (4645); 55 Stanhope LLC (4070); 119 Rogers LLC (1877); 127 Rogers LLC (3901); 325 Franklin LLC (5913); 618 Lafayette LLC (5851); C & YSW, LLC (2474); Natzliach LLC (8821); 92 South 4th St LLC (2570); 834 Metropolitan Avenue LLC (7514); 1125-1133 Greene Ave LLC (0095); APC Holding 1 LLC (0290); D & W Real Estate Spring LLC (4591); Meserole and Lorimer LLC (8197); 106 Kingston LLC (2673); Eighteen Homes LLC (8947); 1213 Jefferson LLC (4704); 167 Hart LLC (1155).

5. Attached hereto as Exhibit D is a true and correct copy of a transcript of April 12, 2021 hearing before this Court.

Dated: January 18, 2022

/s/ Matthew B. Stein
Matthew B. Stein